

RESPONSE TO EPA

Information requested by email on 12/4/13:

- 1) A copy of the asbestos inspection for the building where a flooring renovation took place.
- 2) A copy of any recent asbestos sampling test results, and describe where the sample(s) were collected.
- 3) Describe the scope of the flooring renovation project which took place early this year (I believe this was in April 2013). For example, include the square footage of the break room and hallway where flooring was removed.

PLEASE NOTE THERE ARE TWO PENDING ACTIONS. SEE NOTATIONS IN RED.

(#1) 1989 ASBESTOS SURVEY AND ASSESSMENT REPORT

A 1989 Asbestos Survey and Assessment Report showed flooring tile in the ITD District 6 Maintenance Shop Supply Building, located in Rigby, had tested negative for asbestos (*see document sent to EPA 12-6*).

(#3) SPRING 2013 FLOORING RENOVATION PROJECT SCOPE

The flooring renovation project was located in the ITD District 6 Maintenance Shop Supply Building located in Rigby. It took place in late April/Early May 2013. The project was of short duration, a couple days. The project scope was to renovate the flooring in a “breakroom” and the adjacent hallway. The project included the removal of existing tile and the installation of an epoxy floor surface. The final epoxy floor was done by a contractor (Advanced Flooring Concepts). Prior to this work, the existing tile was removed by Idaho Work Camp inmates, under the supervision of the Idaho Department of Corrections.

The break room measures 24’ x 14’. The hallway measures 31’ x 4’. The inmate crew removed approximately 460 square feet of flooring tile. (*See attachment 1 for a graphic of the area tile removal*). District staff observing the construction activity gave the inmate crew dust masks and safety glasses. The staff also gave them water to use with the buffer in order to reduce the dust during the removal of the mastic. The district staff did not believe there was asbestos present in the floor tile.

(#2) NOVEMBER 2013 ASBESTOS SAMPLING TEST

In late November, the ITD Environmental Section Manager was verbally notified of a complaint made to EPA by a member of the work crew. Upon learning of the complaint, ITD notified Executive and District management and began interviews of district staff. ITD sent a floor tile sample, taken from an adjacent room, to a laboratory for testing. This tile was thought to be the same as the tile that was removed in the renovation. The test results came back positive for asbestos. (*See attachment 1 test results*). This test result conflicted with the 1989 report.

To protect employee safety, ITD removed staff from that area of its facility until further notice. To determine if a health hazard was present, ITD ordered PCM, TCM and surface wipe tests to be done by Teton Environmental Health in Idaho Falls.

Tests were done with a rush order on Friday, Nov. 29. Teton Environmental had a delay in response to ITD due to power failure effects on their computer system. On 12/5 they responded verbally to ITD. The testing results showed no asbestos in the air. The tests found trace amounts of asbestos with the wipe test on top of the break room shelving. The final written report **IS PENDING**.

(#2) DECEMBER 2013 ASBESTOS SAMPLING TEST

The conflicting floor tile test results were puzzling. Based on recent discussions with asbestos subject matter experts, the method of testing used in the past sometimes produced false negatives. ITD staff identified a small residual sample of the original tile remaining below a baseboard. This allows us the opportunity to test the tile that was removed. The sample was sent for testing. **(results pending, EXPECTED THIS WEEK).**

DECEMBER 2013 FOLLOW-UP ACTIONS

ITD has directed statewide district managers to stand down on any facility renovation activities until we have a complete resurvey of the buildings and staff training.

ITD contacted the Idaho Department of Public Works for recommendations for a clean-up contractor to clean the break room, the heat vents and the top shelf closest to the heat vent in the supply room, as recommended by Teton Environmental. The break room has been closed until cleanup efforts are complete.

ITD has also been in contact with the Idaho Department of Public Works regarding their assistance in contracting a complete inspection of the buildings at the Rigby Site. All ITD buildings will receive a full re-inspection before any renovation or demolition activities proceed.

During interviews, district staff stated that an inspector from the Idaho Office of Public Safety had done a site visit in late September or early October. ITD never received follow-up communication or report on this site visit. ITD contacted the Public Safety inspector for information and was referred to the Idaho Industrial Commission. On December 4, ITD finally received a copy of the report including six recommendations. ITD has not received any formal finding from the Industrial Commission.

Guidance and Training - ITD has assigned the preparation of guidance and training for asbestos to a staff member in the ITD Environmental section. This work has begun. Training will be prepared for various staff levels. An "awareness" training will be provided for general staff and managers. Each district office will have a Haz Mat Coordinator who has received asbestos training.